

SEP 25 3 14 PM '01

# GLOBAL SETTLEMENT AND RELEASE

This Settlement and Release constitutes a complete and final resolution of all outstanding issues between Robert J. Dole, Jack Kemp, Dole/Kemp '96, Inc. Dole for President, and the Dole/Kemp '96 Compliance Committee, Inc. and Allen Haywood, assistant treasurer (hereinafter "Dole Committees"). As part of a global settlement of all repayment and enforcement matters related to Senator Robert J. Dole, Jack Kemp and their authorized committees from the 1996 presidential election, Dole/Kemp '96, Inc. agrees to withdraw its action pending against the Federal Election Commission (Robert Dole v. Federal Election Commission, No. 01-1095, D.C. Cir. 2001) and the Federal Election Commission ("FEC") agrees to settle and cease all actions against Robert J. Dole, Jack Kemp, Dole/Kemp '96, Inc. Dole for President, and the Dole/Kemp '96 Compliance Committee, Inc. and Allen Haywood, assistant treasurer and allow the Dole Committee to terminate its registration and reporting obligations with the FEC without further submissions, such as the submission of debt settlement statements, provided that the Dole Committees pay \$1,422,348.40 to the U.S. Treasury representing repayment obligations and fulfill the other obligations in this Settlement and Release.

Additionally, the Dole Committees agree to enter into a Conciliation Agreement containing a civil penalty in the amount of \$75,000; the Dole Committees also agree to pay \$20,000 toward the \$269,282 owed for stale-dated checks. The Dole

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Committees will exercise best efforts in obtaining the remaining \$249,282 for stale-dated checks. The Dole Committees will provide documentation of such efforts to the Commission on a monthly basis. The documentation to be presented to the Commission by the Dole Committees to demonstrate its best efforts includes, but is not limited to, copies of all solicitation letters mailed, receipts for disbursements made to assist in generating the funds, and schedules of when the solicitation letters were sent out. In the event that these efforts to obtain funds for the stale-dated checks fall short of the \$249,282 outstanding and if there are funds in the Dole Committees that have not been paid to the Commission as a result of these efforts, the Commission may file suit to recover any such remaining funds from the Dole Committees and their respective treasurers currently registered with the Commission as treasurers. Also, until its obligations to the Commission are satisfied, the Dole Committees agree to pay to the Commission all funds maintained or raised by the Dole Committees within 120 days of signing this Settlement and Release, except funds needed to pay obligations to the government, such as payment of income taxes.

It is also agreed that neither Robert J. Dole nor Jack Kemp were a party to, or in any way personally involved in, the alleged campaign violations that resulted in the agreement.


All payments required under this Settlement and Release will be made within 120 days of the Commission's approval. Any right the Commission has to file suit

under this Settlement and Release shall be filed within 30 days of the expiration of the 120 day period that the Dole Committees have to exercise best efforts.

FOR THE COMMISSION:

By:  027/1, 2001  
Lois G. Lerner Commissioner of the Dole Committee Date  
Acting General Counsel

FOR THE RESPONDENTS:

 Aug 31, 2001  
Kenneth A. Gross Date  
Berl Bernhard  
Larry Levinson  
Counsel for the Respondents